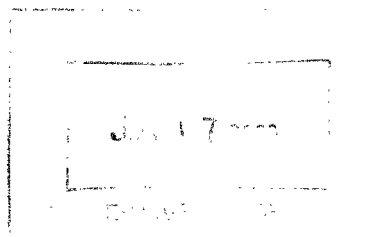


June 13, 2003

EPA West (Air Docket)
Attention Docket ID No. OAR-2002-0053
U.S. EPA (MD-6102T), Room B-108
1200 Pennsylvania Avenue, NW
Washington, DC 20460



RE: Standards of Performance for Stationary Gas Turbines: Proposed Rule
Amendments, 68 *Fed. Reg.* 17990 (April 14, 2003)

Dear Sir or Madam:

The American Chemistry Council (The Council) is providing the following comments in response to the Environmental Protection Agency's (EPA) "Standards of Performance for Stationary Gas Turbines" Proposed Rule Amendments, 68 *Fed. Reg.* 17990 (April 14, 2003). The Council represents the leading companies engaged in the business of chemistry. Council members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. The Council is committed to improved environmental, health and safety performance through Responsible Care, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing. The business of chemistry is a \$462 billion a year enterprise and a key element of the nation's economy. It is the nation's #1 exporting sector, accounting for 10 cents out of every dollar in U.S. exports. Chemical companies invest more in research and development than any other industry. The business of chemistry spends \$20 billion annually to comply with all federal regulations, and of this amount, \$12 billion (or 60%) is spent complying just with environmental regulations each year. The Council's member companies use many stationary gas turbines in their facilities to recover excess heat and produce steam or electricity that would otherwise be lost. Thus, Council members will be directly affected by the Agency's decisions.

The Council believes that the proposed revisions are an improvement to the existing regulatory language and will simplify permits, permitting, and compliance requirements, as well as ease unnecessary regulatory burdens without compromising the environmental benefits of the NSPS. The Council supports EPA's proposed rule revisions insofar as they would codify alternative testing and monitoring procedures that have previously been approved by US EPA for individual facilities, as well as provide much-needed updates to several provisions of this outdated performance standard. Furthermore, the Council urges the Agency to implement the changes without further delay.



Responsible Care®

While the Council has one general comment regarding the definition of “diffusion flame stationary combustion turbines,” we also support the comments submitted by the General Electric Company (GE) on May 14, 2003. The Council has reviewed the proposed modifications and urges EPA to maintain a consistent definition for “diffusion flame stationary combustion turbine” between the Section 111, New Source Performance Standards and Section 112, National Emission Standards for Hazardous Air Pollutants, Stationary Combustion Turbines.

The Council appreciates the opportunity to provide comments on this EPA proposal and we encourage EPA to consider our comments along with GE’s comments prior to finalizing the NSPS amendments. If you have any questions regarding these comments, please contact Brad Shanks at (703) 741-5240 or brad_shanks@americanchemistry.com.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Cromwell", written over the word "Sincerely,".

Ted Cromwell
Co-Leader, Air Team

cc: Mr. Jaime Pagan, EPA